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AIR PROTECTION BRANCH

July 25, 2011

Ms. Tracey Hiltunen
Environmental Engineer
Stationary Source Permitting Program
Air Protection Branch
Georgia Environmental Protection Division
4244 International Parkway
Suite 120
Atlanta, Georgia 30364

Re: Application No. 20161, dated January 7, 2011
Chambers R&B Landfill, AIRS No. 01100014
Application for a Landfill Gas-To-Energy Facility

Dear Ms. Hiltunen:

In response to your letter received on July 11, 2011, Sage Environmental Consulting, L.P. (Sage) submits this letter on behalf of Waste Management, Inc. (WM). We have reviewed your comments regarding the proposed emission rates and limits for BACT and modeling purposes, and respond as follows:

1. Carbon Monoxide (CO)

As you stated, the engine manufacturer quotes a Not-to-Exceed (NTE) emission rate of 4.13 g/bhp-hr that would apply to the engine after 100 operating hours. Interestingly, the RACT/BACT/LAER Clearinghouse lists the very same engines as proposed in the application as capable of meeting the 2.75 g/bhp-hr limit that your letter refers to as a proposed BACT limit. We have contacted the engine manufacture and inquired as to how these sites can guarantee that they can meet an emissions rate lower than that listed in the manufacturer's published technical specification sheet. The manufacturer has advised that it is revising the technical data sheet to remove the 100 hr limit from the specification sheet and increasing the NTE rate for CO. Upon receipt of this information we will provide further response to you.

2. Nitrogen Oxides (NOx)

As you stated the engine manufacturer's technical data sheet lists a NOx emissions rate of 0.5 g/bhp-hr. We observe that GAEPD did not acknowledge that the technical data sheet incorporates note number 13 with this stated emissions rate. Note 13 states "NOX TOLERANCES ARE \pm 18% OF THE SPECIFIED VALUE". Since 0.5 times 1.18 is equal to 0.59, we contend that a guaranteed maximum emissions rate suitable for inclusion in a permit application, including for BACT emissions limits and modeling purposes, should be 0.6 g/bhp-hr (rounded to the one significant digit). We note that the Clearinghouse lists NOx emissions rates for similar installation in the range of 0.5 g/bhp-hr

to 0.6 g/bhp-hr. We concur that the averaging period for this limit should be 3-hour average.

3. Particulate Matter (PM)

We concur with your proposed emissions limit for Total PM, Total PM₁₀, and Total PM_{2.5}, of 0.848 lb/hr, where the term "Total" includes both filterable and condensable PM.

4. Volatile Organic Compounds (VOC)

We concur with your proposed emissions limit for VOC of 3.21 lb/hr.

5. Sulfur Dioxide (SO₂)

We concur with your proposed emissions limit for SO₂ of 1.52 lb/hr.

Additionally, these engines will be subject to the annual testing requirements of each engine under NSPS JJJJ, making it very important that potentially achievable emission limits are associated with each engine. Before NSPS JJJJ, some sites may have taken lower emission limits knowing that they would not have to test those engines for compliance or would only be required to test on a very infrequent basis.

Sage will commence the air dispersions modeling efforts upon final resolution of items 1 and 2 as listed above.

If you have any questions regarding this response, please contact Bill Apple at (678) 560-6737.

Sincerely,
Sage Environmental Consulting, L.P.



William S. Apple
Project Manager

Cc: Tim Bassett, Waste Management
Dave Thorley, Waste Management